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12 IN THE UNITED STATES DISTRICT COURT
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14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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17 UNITED STATES OF AMERICA,) No. CR-12-0834 EMC
18 Plaintiff,)
19 v.) STIPULATION AND [PROPOSED] ORDER TO CONTINUE
20)
21 JUAN DOMINGUEZ JR.,)
22 Defendant.)
23)
24)
25)
26)

27 The parties jointly request that, subject to the Court's approval, the status conference
28 presently set for May 8, 2013 be continued to May 22, 2013 at 2:30 pm.

29 Defense counsel and government counsel are currently in negotiations over a resolution
30 of this matter. Government counsel is out on paternity leave and defense counsel is required to
31 take furlough days making resolution of this case more timely than normal to complete these
32 negotiations. Accordingly, the parties jointly request that the appearance be continued from May
33 8, 2013 to May 22, 2013.

34 For the above reasons, the parties stipulate there is good cause – taking into account the
35 public interest in the prompt disposition of this case – to exclude the time from May 8, 2013 to
36 May 22, 2013 from computation under the Speedy Trial Act, and that failing to exclude that time

1 would unreasonably deny the defendant and his counsel the reasonable time necessary for
2 effective preparation and continuity of counsel, taking into account the exercise of due diligence.
3 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties further agree that the ends of justice would be
4 served by excluding the time from May 8, 2013 to May 22, 2013 from computation under the
5 Speedy Trial Act and that the need for the exclusion outweighs the best interests of the public
6 and the defendant in a speedy trial.

7 IT IS SO STIPULATED.

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9 5/1/13
10 DATED

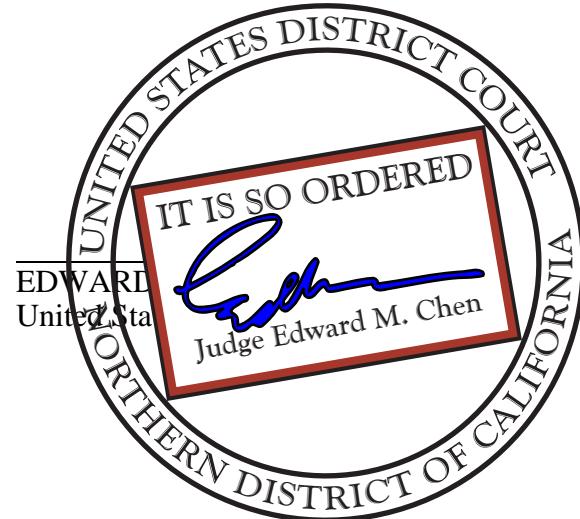
/s/
11 RANDY S. LUSKEY
12 Assistant United States Attorney

13 5/1/13
14 DATED

/s/
15 JODI LINKER
16 Assistant Federal Public Defender

17 IT IS SO ORDERED.

18 5/6/13
19 DATED



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24 Stipulation & [Proposed] Order to Continue;
25 *US v. Dominguez*, Case No. 12-0834 EMC